

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

RONNY L. JACKSON, <i>et al.</i>)	
)	
)	
Plaintiffs,)	
v.)	No. 2:22-cv-241
)	
JOSEPH R. BIDEN, JR <i>et al.</i>)	
)	
Defendants.)	
)	

UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants respectfully request an extension of time to answer or otherwise respond to the Complaint, *see* ECF No. 1, up to and including April 10, 2023. Counsel for Defendants conferred with counsel for Plaintiffs regarding this request pursuant to Local Civil Rule 7.1(a), and counsel for Plaintiffs indicated they do not oppose. In support of this request, Defendants state as follows:

1. Plaintiffs' Complaint purports to challenge the United States' aid to Palestine pursuant to the Taylor Force Act, Pub. L. 115–141, div. S, title X, 132 Stat. 1143 (Mar. 3, 2018). It was filed on December 20, 2022, and served on the office of the United States Attorney for the Northern District of Texas on January 9, 2023. Defendants' current deadline to answer or otherwise respond to the complaint is March 10, 2023.

2. Good cause exists for the requested extension. The Complaint alleges that the United States is unlawfully funding the Palestinian Authority, and on that basis asserts claims under the Administrative Procedure Act and the Constitution. Defendants must answer or otherwise respond to these claims by March 10. In addition to this case, the undersigned counsel is managing several other cases including a motion to dismiss brief due by March 8 in *Bradley v. U.S. Dep't of Education*, No. 22-3442 (D.D.C.), a case challenging the Department of Education's student loan fraud prevention and relief procedures, and a motion to dismiss reply brief due by March 21 in *Laschober v. Cardona, et*

al, No. 22-1373 (D. Or.), a case challenging the Department of Education's student loan forgiveness plan and loan payment pause. In *Laschober*, plaintiff has also indicated that he intends to file a motion for summary judgment, to which Defendants in that case, represented by the undersigned counsel, will also need to respond. The requested extension of time, therefore, will allow counsel adequate time to complete preparation of a response to the Complaint in this case in addition to managing these other litigation tasks.

3. This is the first request for extension made by Defendants regarding their deadline to respond to the Complaint. There are currently no other deadlines scheduled in this matter, so the requested extensions will not impact any existing deadlines.

4. Plaintiffs' counsel does not oppose the requested extension.

5. Defendants thus request an extension of their time to respond to Plaintiffs' Complaint up to and including April 10, 2023. Defendants thank the Court for its consideration of this request.

Dated: February 28, 2023

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General
Civil Division

ANTHONY J. COPPOLINO
Deputy Director

/s/ Samuel Rebo
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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2023, I electronically filed this brief with the Clerk of the Court for the United States District Court for the Northern District of Texas by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

/s/ Samuel Rebo
SAMUEL REBO
U.S. Department of Justice

CERTIFICATE OF CONFERENCE

I certify that on February 23, 2023, undersigned counsel conferred with counsel for Plaintiffs regarding this motion pursuant to Local Civil Rule 7.1. Plaintiffs do not oppose Defendants' motion for extension of time.

/s/ Samuel Rebo
SAMUEL REBO